

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITTANY VONBERGEN, individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE  
COMPANY,

Defendant.

Case No. 2:22-CV-04880

Judge Gene E.K. Pratter

**DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY'S NOTICE OF  
SUPPLEMENTAL AUTHORITY IN SUPPORT OF MOTION TO DISMISS**

Defendant Liberty Mutual Insurance Company (“LMIC”) hereby respectfully submits this Notice of Supplemental Authority in support of its Motion to Dismiss Plaintiff’s Amended Complaint (Dkt. 23) and its Reply in Support of Its Motion to Dismiss Plaintiff’s Amended Complaint (Dkt. 26).

On July 24, 2023, the United States District Court for the District of Massachusetts issued a decision in the case styled *Alves v. Goodyear Tire and Rubber Company*, Case No. 22-11820-WGY (Young, J.), relevant to LMIC’s argument that Plaintiff failed to demonstrate that the Court has personal jurisdiction over LMIC. In *Alves*, the court held that the accessibility of Goodyear’s interactive website in Massachusetts (the forum state) that solicited sales in Massachusetts and “offered residents the ability to schedule services provided by Goodyear at one of its many service locations in Massachusetts” was insufficient as a matter of law to subject Goodyear to the court’s personal jurisdiction.

A copy of *Alves* is attached hereto as Exhibit A.

Dated: July 31, 2023

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Respectfully submitted,

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*Counsel for Defendant Liberty Mutual  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on July 31, 2023, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Julie Singer Brady

Julie Singer Brady

*Counsel for Defendant Liberty*

*Mutual Insurance Company*